

REAL TALKERS - NO GOLF 2000

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2013 JAN -8 PM 6: 43

JOY EDISON

Petitioner/Movant

V.

UNITED STATES OF AMERICA

Respondent

Criminal No. JFM-10-0493

Civil No. JFM-12-2503

COMES NOW, JOY EDISON and respectfully requests that she be issued a Certificate of Appealability in her instant case. Movant believes that her Sixth Amendment right to counsel has been violated as counsel failed to perform as the 'counsel' that the Sixth Amendment entitles her to in all phases of the legal proceedings.

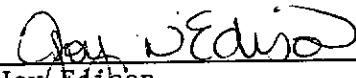
Counsel's failure to investigate caused him to ignore the adversarial process and gave the prosecutor an unfair advantage in that facts were relied on that were clearly erroneous. The prosecutor stated that the court was angered by the fact that movant and 'Steven Blackwell were captured on film depositing \$83,000 in cash into her bank account to partially finance the purchase of their \$750,000 home..' The bank deposit clearly shows a deposit of \$500. Additionally allegations that her college tuition payment was paid by drug proceeds is not bore out by the records. Reference to a 'bill of over \$8,000 in cash used to pay tuition' is also not borne out by bank statements or even the cost of College tuition.

Therefore movant requests the Court's permission to move forward with her case in the interest of justice. Movant was prejudiced from counsel's errors that were clearly stated in her 2255 motion and supporting

documentation. 'The need for finality and certainty in the sentencing process has been recognized, but the sole due process interest of the defendant being protected is the right not to be sentenced on the basis of invalid premises or inaccurate information. Justice cannot be considered served'. Dolan v. United States, 130, S. Ct. 2533, 2537 (2010)

Ececuted this \ day of January, 2013.

Respectfully submitted:


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